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Counsel for Defendant
National Center for Safety Initiatives, LLC

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JASMINE GRACE,

Case No.: 2:23-cv-00803-CDS-BNW

Plaintiff,

v.

NATIONAL CENTER FOR SAFETY
INITIATIVES, LLC,

Defendant.

**STIPULATION OF EXTENSION OF TIME FOR DEFENDANT
NATIONAL CENTER FOR SAFETY INITIATIVES, LLC TO FILE ANSWER**

Defendant National Center for Safety Initiatives, LLC (“NCSI”) has requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant National Center for Safety Initiatives, LLC’s time to answer, move or otherwise respond to the Complaint in this action is extended from June 23, 2023 through and including July 14, 2023. NCSI anticipates using the additional time to investigate Plaintiff’s allegations and prepare a meaningful response to the specific allegations, if necessary. Further, counsel for NCSI Plaintiff anticipate engaging in settlement discussions. The

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additional time to respond to the Complaint will facilitate these discussions. This stipulation is filed in good faith and not intended to cause delay.

Dated: June 21, 2023

Respectfully submitted,

BAUMAN LOEWE WITT
& MAXWELL, PLLC

By: /s/ Michael C. Mills
Michael C. Mills, Esq.
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*Counsel for Defendant
National Center for Safety
Initiatives, LLC*

Dated: June 21, 2023

Agreed & Consented to:

CONSUMER ATTORNEYS

By: /s/ Michael Yancey III
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*Counsel for Plaintiff
Jasmine Grace*

IT IS SO ORDERED;

Herb Weiden
United States Magistrate Judge

By: [REDACTED] June 22, 2023

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, I presented the foregoing STIPULATION OF EXTENSION OF TIME FOR DEFENDANT NATIONAL CENTER FOR SAFETY INITIATIVES, LLC TO FILE ANSWER with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Michael C. Mills
Michael C. Mills
Counsel for Defendant
National Center for Safety
Initiatives, LLC